

August 1, 2014

**VIA ECF FILING AND E-MAIL TRANSMISSION**

The Honorable Robert E. Gerber  
United States Bankruptcy Judge  
United States Bankruptcy Court  
Southern District of New York  
Alexander Hamilton Custom House  
One Bowling Green  
New York, New York 10004

**Re: In re Motors Liquidation Company, et al. Case No. 09-50026  
(REG)  
Phaneuf No Stay Pleading**

Dear Judge Gerber:

We are counsel for plaintiffs in *Phaneuf v. General Motors LLC*, No. 1:14-cv-3298 (S.D.N.Y.). We write in response to the Notice of Settlement and proposed form of Order Denying The Relief Requested By The Phaneuf Plaintiffs In Their No Stay Pleading, submitted by General Motors LLC ("New GM") on July 31, 2014.

Exhibit A to New GM's proposed order is a "Stipulation Staying Action," which contains a signature block for undersigned Plaintiffs' counsel with an S-signature ("/s/"). To be clear, Defense counsel was not authorized to include my e-signature on the Stipulation. To the contrary, Plaintiffs' counsel explicitly informed Defense counsel that Plaintiffs do not agree to the Stipulation. Plaintiffs' counsel did not sign and Plaintiffs do not consent to the stipulation. Plaintiffs intend to appeal the Court's order.

A proposed counter-order is submitted herewith.

Respectfully submitted,



D. Greg Blankinship

cc: Jeffrey C. Block  
Arthur Steinberg